

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. DANIEL ALBERT AMATUZIO,

2. KYLE RICHARD BERGMAN,

3. DILLON PHILLIP BEYERS,

4. JEFFREY JAMES BOSHEY,

5. BRAD RODNEY CHRISTOFFERSON,

6. LAWRENCE LALONDE COLTON,
a/k/a "Lo,"

7. RHONDA ANN DAVIS,

8. RYAN JAMES DRICKHAMER,

9. BRIAN TROY EASTLICK,

10. ZACHARY JOHN HAMEL,

11. JUSTIN PAUL JOHNSON,

12. RINDI KAY KOENEN,

13. JOHNNIE LEE LEDDELL,

14. JEFFREY LAMONT LIDDELL,
a/k/a "Jy General,"
a/k/a "J.G.,"
a/k/a "Little Jeff,"15. VERONIQUE ZSAZSAANTIQUE MUCKLE,
a/k/a "Nique Nique,"

16. JACOB KEITH NAGLE,

17. BRIAN KEITH PORTIS,

18. CLETIS BERNARD PORTIS,

INDICTMENT

CR 11-305 DSD/LIB

(18 U.S.C. § 2)

(18 U.S.C. § 924(c))

(18 U.S.C. § 924(d))

(21 U.S.C. § 841(a)(1))

(21 U.S.C. § 841(b)(1)(C))

(21 U.S.C. § 846)

(21 U.S.C. § 848(a))

(28 U.S.C. § 2461(c))

SEP 21 2011

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United States v. Daniel Albert Amatuzio, et al.

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| 19. ERIC PHILLIP ROMERO, |) |
| a/k/a "Big E," |) |
| |) |
| 20. SEAN PATRICK SAYLOR, |) |
| a/k/a "Little Sean," |) |
| |) |
| 21. GORDON EUGENE SHARP, |) |
| |) |
| 22. CAINE RAMUS STARKS, |) |
| |) |
| 23. IAN PHILLIP STAUBER, |) |
| |) |
| 24. DANIEL ALLEN STENZEL, |) |
| |) |
| 25. ANGELIQUE MICHELLE VOS, |) |
| |) |
| 26. KRYSTAL LYNN WILLIS, and |) |
| |) |
| 27. NICOLAS ZANE WORLEY, |) |
| |) |
| Defendants. |) |

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Continuing Criminal Enterprise)

Beginning in or about 2010, and continuing through in or about September 2011, in the State and District of Minnesota, and elsewhere, the defendant,

JEFFREY LAMONT LIDDELL,
a/k/a "Jy General,"
a/k/a "J.G.,"
a/k/a "Little Jeff,"

did unlawfully, knowingly and intentionally engage in a continuing criminal enterprise, in that he unlawfully, knowingly and intentionally violated Title 21, United States Code, Sections 841(a)(1), which violations include, but are not limited to, the

United States v. Daniel Albert Amatuzio, et al.

substantive felony violations alleged in Counts 26, 37, 38, 41, 42, and 43, which Counts are realleged and incorporated herein by reference as though fully set forth in this Count, and which violations were part of a continuing series of violations of the Controlled Substance Abuse Act, Title 21, United States Code, Section 801, et. seq., undertaken by the defendant in concert with at least five other persons with respect to whom the defendant occupied a position of organizer, supervisor, and/or any position of management, and from which such continuing series of violations the defendant obtained substantial income and resources, in violation of Title 21, United States Code, Section 848(a).

COUNT 2

(Conspiracy to Distribute Oxycodone, Oxymorphone and Heroin)

Beginning in or about 2010, and continuing through in or about September 2011, in the State and District of Minnesota and elsewhere, the defendants,

DANIEL ALBERT AMATUZIO,
KYLE RICHARD BERGMAN,
DILLON PHILLIP BEYERS,
JEFFREY JAMES BOSHEY,
BRADLEY RODNEY CHRISTOFFERSON,
LAWRENCE LALONDE COLTON,
a/k/a "Lo,"
RHONDA ANN DAVIS,
RYAN JAMES DRICKHAMER,
BRIAN TROY EASTLICK,
ZACHARY JOHN HAMEL,
JUSTIN PAUL JOHNSON,
RINDI KAY KOENEN,

United States v. Daniel Albert Amatuzio, et al.

JOHNNIE LEE LEDDELL,
JEFFREY LAMONT LIDDELL,
a/k/a "Jy General,"
a/k/a "J.G.,"
a/k/a "Little Jeff,"
VERONIQUE ZSAZSAANTIQUE MUCKLE,
a/k/a "Nique Nique,"
JACOB KEITH NAGLE,
BRIAN KEITH PORTIS,
CLETIS BERNARD PORTIS,
ERIC PHILLIP ROMERO,
a/k/a "Big E,"
SEAN PATRICK SAYLOR,
a/k/a "Little Sean,"
GORDON EUGENE SHARP,
CAINE RAMUS STARKS,
IAN PHILLIP STAUBER,
DANIEL ALLEN STENZEL,
ANGELIQUE MICHELLE VOS,
KRYSTAL LYNN WILLIS,
and
NICOLAS ZANE WORLEY,

did unlawfully, knowingly and intentionally conspire with each other and with others, known and unknown to the grand jury, to distribute mixtures and substances containing detectable amounts of oxycodone, oxymorphone, and heroin, all controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 846.

United States v. Daniel Albert Amatuzio, et al.

COUNTS 3-10

(Possession With Intent to Distribute
Oxycodone, Oxymorphone, Hydrocodone, and Heroin)

On or about the dates and in the amounts set out below, in the State and District of Minnesota, and elsewhere, the defendants named below did unlawfully, knowingly and intentionally possess with intent to distribute, and aided and abetted the unlawful, knowing and intentional distribution of mixtures and substances containing detectable amounts of oxycodone, oxymorphone, hydrocodone, and heroin, all controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

| Count | On or About | Defendant(s) | Possessed |
|-------|-------------|--|---|
| 3 | 08/17/2010 | KYLE RICHARD BERGMAN | Oxycodone and Hydrocodone |
| 4 | 10/20/2010 | DANIEL ALBERT AMATUZIO and NICOLAS ZANE WORLEY | Oxycodone |
| 5 | 12/21/2010 | SEAN PATRICK SAYLOR | Oxymorphone and Heroin |
| 6 | 03/02/2011 | IAN PHILIP STAUBER | Oxymorphone |
| 7 | 03/17/2011 | JUSTIN PAUL JOHNSON | Oxymorphone |
| 8 | 03/29/2011 | JOHNNIE LEE LEDDELL | Oxycodone, Oxymorphone, and Hydrocodone |
| 9 | 07/18/2011 | KYLE RICHARD BERGMAN | Oxymorphone |
| 10 | 08/25/2011 | KRYSTAL LYNN WILLIS | Oxymorphone |

United States v. Daniel Albert Amatuzio, et al.

COUNTS 11-70

(Distribution of Oxycodone, Oxymorphone
Hydrocodone and Heroin)

On or about the dates set forth in the transactions set out below, in the State and District of Minnesota and elsewhere, the defendants did unlawfully, knowingly and intentionally distribute, and aided and abetted the unlawful, knowing and intentional distribution, of mixtures and substances which contained detectable amounts of oxycodone, oxymorphone, hydrocodone, and heroin, all controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18 United States Code, Section 2.

| Count | On or About | Defendant(s) | Distributed |
|-------|-------------|-----------------------------------|-------------|
| 11 | 10/04/2010 | JACOB KEITH NAGLE | Oxymorphone |
| 12 | 10/06/2010 | KYLE RICHARD BERGMAN | Oxymorphone |
| 13 | 10/19/2010 | JACOB KEITH NAGLE | Oxymorphone |
| 14 | 11/08/2010 | DANIEL ALBERT AMATUZIO | Oxymorphone |
| 15 | 11/10/2010 | BRIAN TROY EASTLICK | Oxymorphone |
| 16 | 11/23/2010 | RYAN JAMES DRICKHAMER | Oxycodone |
| 17 | 12/13/2010 | VERONIQUE ZSAZSAANTIQUE MUCKLE | Oxymorphone |
| 18 | 12/13/2010 | RYAN JAMES DRICKHAMER | Oxymorphone |
| 19 | 12/14/2010 | ERIC PHILLIP ROMERO | Oxymorphone |
| 20 | 12/15/2010 | JUSTIN PAUL JOHNSON | Oxymorphone |
| 21 | 12/22/2010 | ERIC PHILLIP ROMERO | Oxymorphone |
| 22 | 02/01/2011 | ERIC PHILLIP ROMERO | Oxymorphone |

United States v. Daniel Albert Amatuzio, et al.

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| 23 | 02/03/2011 | IAN PHILIP STAUBER | Oxymorphone |
| 24 | 02/17/2011 | IAN PHILIP STAUBER | Oxymorphone |
| 25 | 03/02/2011 | IAN PHILIP STAUBER | Oxymorphone |
| 26 | 03/09/2011 | JEFFREY LAMONT LIDDELL | Oxymorphone |
| 27 | 03/17/2011 | ANGELIQUE MICHELLE VOS | Oxymorphone |
| 28 | 03/23/2011 | ANGELIQUE MICHELLE VOS | Oxymorphone |
| 29 | 03/28/2011 | JOHNNIE LEE LEDDELL | Oxymorphone |
| 30 | 03/28/2011 | RINDI KAY KOENEN | Oxymorphone |
| 31 | 04/12/2011 | ZACHARY JOHN HAMEL | Oxymorphone |
| 32 | 04/14/2011 | ZACHARY JOHN HAMEL | Heroin |
| 33 | 04/19/2011 | CAINE RAMUS STARKS | Oxycodone and Oxymorphone |
| 34 | 04/22/2011 | CAINE RAMUS STARKS and RHONDA ANN DAVIS | Oxycodone |
| 35 | 04/25/2011 | CAINE RAMUS STARKS | Oxycodone and Hydrocodone |
| 36 | 04/25/2011 | VERONIQUE ZSAZSAANTIQUE MUCKLE and ZACHARY JOHN HAMEL | Oxymorphone |
| 37 | 04/29/2011 | JEFFREY LAMONT LIDDELL | Oxymorphone |
| 38 | 05/05/2011 | JEFFREY LAMONT LIDDELL | Oxymorphone |
| 39 | 05/06/2011 | JACOB KEITH NAGLE | Oxymorphone |
| 40 | 05/10/2011 | CAINE RAMUS STARKS and RHONDA ANN DAVIS | Oxycodone |
| 41 | 05/12/2011 | JEFFREY LAMONT LIDDELL | Oxymorphone |
| 42 | 05/13/2011 | JEFFREY LAMONT LIDDELL | Oxymorphone |
| 43 | 05/23/2011 | JEFFERY LAMONT LIDDELL | Oxymorphone |
| 44 | 06/01/2011 | CAINE RAMUS STARKS | Oxymorphone |
| 45 | 06/06/2011 | CAINE RAMUS STARKS | Oxymorphone |

United States v. Daniel Albert Amatuzio, et al.

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| 46 | 06/13/2011 | BRAD RODNEY CHRISTOFFERSON and GORDON EUGENE SHARP, JR. | Oxymorphone |
| 47 | 06/15/2011 | BRAD RODNEY CHRISTOFFERSON and GORDON EUGENE SHARP, JR. | Oxymorphone |
| 48 | 06/21/2011 | JACOB KEITH NAGLE and GORDON EUGENE SHARP, JR. | Oxymorphone |
| 49 | 06/21/2011 | DILLON PHILLIP BEYERS | Oxymorphone |
| 50 | 06/23/2011 | GORDON EUGENE SHARP, JR. | Oxymorphone |
| 51 | 06/24/2011 | GORDON EUGENE SHARP, JR. | Oxymorphone |
| 52 | 06/27/2011 | CAINE RAMUS STARKS | Oxymorphone |
| 53 | 06/28/2011 | DILLON PHILLIP BEYERS | Oxymorphone |
| 54 | 06/28/2011 | GORDON EUGENE SHARP, JR. | Oxymorphone |
| 55 | 06/29/2011 | DILLON PHILLIP BEYERS | Oxymorphone |
| 56 | 06/29/2011 | CAINE RAMUS STARKS | Oxymorphone |
| 57 | 07/08/2011 | GORDON EUGENE SHARP, JR. | Oxymorphone |
| 58 | 07/11/2011 | DANIEL ALLEN STENZEL | Oxymorphone |
| 59 | 07/12/2011 | VERONIQUE ZSAZSAANTIQUE MUCKLE and LAWRENCE LALONDE COLTON | Oxymorphone |
| 60 | 07/12/2011 | DANIEL ALLEN STENZEL | Oxymorphone |
| 61 | 07/13/2011 | VERONIQUE ZSAZSAANTIQUE MUCKLE and CLETIS PORTIS | Oxymorphone |
| 62 | 07/18/2011 | VERONIQUE ZSAZSAANTIQUE MUCKLE | Oxymorphone |
| 63 | 07/18/2011 | DANIEL ALLEN STENZEL | Oxymorphone |
| 64 | 08/10/2011 | JEFFREY JAMES BOSHEY | Oxymorphone |
| 65 | 08/15/2011 | JEFFREY JAMES BOSHEY | Oxymorphone |
| 66 | 08/18/2011 | JEFFREY JAMES BOSHEY | Oxymorphone |

United States v. Daniel Albert Amatuzio, et al.

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| 67 | 08/25/2011 | JEFFREY JAMES BOSHEY | Oxymorphone |
| 68 | 08/29/2011 | DANIEL ALLEN STENZEL | Oxymorphone |
| 69 | 09/6/2011 | BRIAN KEITH PORTIS, CLETIS BERNARD PORTIS, AND NICHOLAS ZANE WORLEY | Oxymorphone |
| 70 | 09/6/2011 | LAWRENCE LALONDE COLTON and VERONIQUE ZSAZSAANTIQUE MUCKLE | Oxymorphone |

COUNT 71

(Using, Carrying, or Possessing a Firearm
During and in Relation to a Drug Trafficking Crime)

On or about June 1, 2011, in the State and District of
Minnesota, the defendant,

CAINE RAMUS STARKS,

did knowingly use, carry and possess a firearm, namely one (1)
Vincenzo Bernardelli 12 gauge, side-by-side shotgun, serial number
#3398, during and in relation to a drug trafficking crime for which
he may be prosecuted in a court of the United States, namely Count
44, which Count is realleged and incorporated herein by reference
as though fully set forth in this Count, in violation of Title 18,
United States Code, Section 924(c) (1) (A).

United States v. Daniel Albert Amatuzio, et al.

COUNT 72

(Using, Carrying, or Possessing a Firearm
During and in Relation to a Drug Trafficking Crime)

On or about June 6, 2011, in the State and District of
Minnesota, the defendant,

CAINE RAMUS STARKS,

did knowingly use, carry and possess a firearm, namely one (1) I.O.
Inc. .380 caliber ACP Hellcat pistol, serial number 04987, during
and in relation to a drug trafficking crime for which he may be
prosecuted in a court of the United States, namely Count 45, which
Count is realleged and incorporated herein by reference as though
fully set forth in this Count, in violation of Title 18, United
States Code, Section 924(c)(1)(A).

COUNT 73

(Using, Carrying, or Possessing a Firearm
During and in Relation to a Drug Trafficking Crime)

On or about June 27, 2011, in the State and District of
Minnesota, the defendant,

CAINE RAMUS STARKS,

did knowingly use, carry and possess a firearm, namely one (1)
Bersa SA Thunder 380 Model .380 caliber pistol, serial number
765101, during and in relation to a drug trafficking crime for
which he may be prosecuted in a court of the United States, namely
Count 52, which Count is realleged and incorporated herein by

United States v. Daniel Albert Amatuzio, et al.

reference as though fully set forth in this Count, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 74

(Using, Carrying, or Possessing a Firearm
During and in Relation to a Drug Trafficking Crime)

On or about June 29, 2011, in the State and District of Minnesota, the defendant,

CAINE RAMUS STARKS,

did knowingly use, carry and possess a firearm, namely One (1) HY Hunter Inc. Firearms Mfg. Co. Frontier Six-Shooter Model .22 caliber revolver, serial number 19125, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely Count 56, which Count is realleged and incorporated herein by reference as though fully set forth in this Count, in violation of Title 18, United States Code, Section 924(c)(1)(A).

FORFEITURE ALLEGATIONS

If convicted of any of the Counts 1-70 of this Indictment, the defendants shall forfeit to the United States any property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of each such violations; any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of each such violations; any interest in, claims against, and property or contractual rights affording a

United States v. Daniel Albert Amaturzio, et al.

source of control over, the violations alleged in Count 1 of this Indictment; and any substitute for such property under Title 21, United States Code, Section 853(p); all pursuant to Title 21, United States Code, Section 853.

If convicted of any of Counts 71-74 of this Indictment, Defendant CAINE RAMUS STARKS shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c), any firearm with accessories and any ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 924(c), including but not limited to:

1. One Vincenzo Bernardelli 12 gauge side-by-side shotgun, serial number 3398;
2. One I.O. Inc. .380 caliber ACP Hellcat pistol, serial number 04987;
3. One (1) Bersa SA Thunder 380 Model .380 caliber pistol, serial number 765101;
4. One (1) HY Hunter Inc. Firearms Mfg. Co. Frontier Six-Shooter Model .22 caliber revolver, serial number 19125.

All in violation of Title 18, United States Code, Sections 922(g)(1), 922(j), 924(a)(2) and 924(d)(1) and Title 28, United States Code, Section 2461(C).

United States v. Daniel Albert Amatusio, et al.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON